



ROPES & GRAY LLP

45 ROCKEFELLER PLAZA

BOSTON NEW YORK

NEW YORK, NY 10111-0087

SAN FRANCISCO

212-841-5700

WASHINGTON, DC

F 212-841-5725

May 26, 2006

Gabriel D. O'Malley

617-951-7656

gabriel.o'malley@ropesgray.com

Via Electronic Filing

Magistrate Judge Robert B. Collings
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210

Re: Carr v. Siemens Dematic Corp., et al. Civil Action #: 05-CV-10445MLW

Dear Magistrate Judge Collings:

At the request of the Court, counsel for AMEC Construction Management, Inc. ("AMEC") and the Plaintiff have conferred on the issue of which of the Plaintiff's objections asserted in his Answers to AMEC's Interrogatories and AMEC's Requests for Production of documents will be waived.

As reflected in detailed correspondence between the parties, counsel have come to an agreement regarding the waiver of certain of the Plaintiff's objections. Specifically, the Plaintiff agrees to waive all objections except for those objections based on attorney/client privilege and/or the work product doctrine. Counsel for Plaintiff has furnished AMEC with a log setting forth his claims that certain documents are protected by the attorney/client privilege and/or the work product doctrine. Counsel for AMEC reserves its right to challenge these claims of privilege if the parties are not able to agree on the propriety of these assertions of privilege.

Sincerely,

A handwritten signature in black ink, appearing to read "G. O'Malley", written over a circular line.

Gabriel D. O'Malley

cc: Daniel M. Suprenant, Esq.